

Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352

99-RU-0450

Mr. M. J. Lawrence, Executive Vice President General Manager TWRS Project BNFL Inc. 3000 George Washington Way Richland, Washington 99352

Dear Mr. Lawrence:

REGULATORY UNIT (RU) COMMENTS ON BNFL RESPONSE TO QUALITY ASSURANCE (QA) INSPECTION REPORT IR-99-002

Reference: 1. BNFL Letter 004579, "Contract No. DE-AC06-96RL13308 – W375 – Response to Quality Assurance Inspection Report," July 12, 1999,

2. DOE Letter 99-RU-0360, "Quality Assurance Inspection Report, IR-99-002," June 10, 1999

The RU has reviewed the requested information in the BNFL Inc. response (Reference 1) to the QA Inspection Report, IR-99-002 (Reference 2) and has determined that the response is acceptable and that the corrective action commitments, if properly implemented, should be sufficient to address the finding (IR-99-002-02-FIN). The RU has no additional requests for information on this matter at this time.

In accordance with RU Management Directive 2.3, "Commitment Management System," the RU will track the BNFL Inc. corrective action commitments that were described in Reference 1 per the enclosed "Table 1 – BNFL Inc. Quality Assurance Corrective Action Commitments."

The RU will verify your corrective actions during future inspection activities. Once the corrective actions have been verified, the RU will close Inspection Finding IR-99-002-02-FIN.

Nothing in this letter should be construed as changing the Contract (DE-AC06-96RL13308). If you have any questions on the tracking of these items, inspection follow-up, or any other questions regarding this inspection, please contact me or Pat Carier of my staff on (509) 376-3574.

Sincerely,

D. Clark Gibbs, Regulatory OfficialOffice of Radiological, Nuclear andProcess Safety Regulation

RNP:JWM

Enclosure:
Table 1 - BNFL Inc. Quality Assurance
Corrective Action Commitments

cc w/encl: D. W. Edwards, BNFL

Table 1 – BNFL Inc. Quality Assurance Corrective Action Commitments

Commitment	Commitment	Expected	Requires	Authorization
Number	Description	Completion	Incorporation in	Basis
	•	Date	the Authorization Basis? ¹	Document Affected
99-CMS-020	Revise QAPIP to reflect BNFL's plan to perform cause and preventative action determination on a subset of all deficiency reports based on significance (IR-99-002- 02-FIN)	09/30/99	YES	QAPIP
99-CMS-021	Revise K13P005, Revision 1 to clarify BNFL's policy on revising the QAPIP.	10/15/99	No	
99-CMS-022	Revise QAPIP to remove Dual Storage requirements for records. (IR-99-002-04-IFI)	09/30/99	YES	QAPIP
99-CMS-023	Revise K40P001 and K40C001 to remove inappropriate note concerning applicability of QA requirements (IR-99-002-05-IFI).	07/99	No	
99-CMS-024	Revise code of practice for source evaluation and selection to address approved vendor list (AVL) control. (IR-99- 002-01-IFI)	08/31/99	NO	

[&]quot;Yes," in the column "Requires Incorporation in the authorization basis," means that the RU expects that the corrective action commitment will be reflected in a revision to the indicated authorization basis document.